

**Fill in this information to identify the case:**

Debtor 1 Stacey L. Lowden-Poole

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 18-23515 JAD

**Form 4100R**

Amended

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Baxter Credit Union      Court claim no. (if known): 10

Last 4 digits of any number you use to identify the debtor's account: 8208

Property address:

505 Lougeay Road  
Pittsburgh, PA 15235

**Part 2: Prepetition Default Payments**

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs. \*\*

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

\*\*The loan was due for 10/01/2023 at the time of hand off from the Chapter 13 Trustee. The last payment received from the trustee was applied to the account as post petition funds. The check has been reallocated to the pre-petition funds. The loan is contractually due for the December 1, 2023 payment.

Debtor(s) Stacey L. Lowden-Poole  
First Name Middle Name

Last Name

Case Number (*if known*): 18-23515 JAD

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- I am the creditor.  
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Denise Carlon

Denise Carlon  
25 Jan 2024, 18:43:55, EST

Date 02/08/2024

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkaroup@kmlawgroup.com](mailto:bkaroup@kmlawgroup.com)  
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: Stacey L. Lowden-Poole</b>	<b>Debtor(s)</b>
<b>Baxter Credit Union</b>	<b>Movant</b>
<b>vs.</b>	
<b>Stacey L. Lowden-Poole</b>	<b>Debtor(s)</b>
<b>Ronda J. Winnecur,</b>	<b>Trustee</b>

**BK NO. 18-23515 JAD**

**Chapter 13**

**Related to Claim No. 10**

**CERTIFICATE OF SERVICE**

**AMENDED RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on February 21, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)  
Stacey L. Lowden-Poole  
505 Lougeay Road  
Pittsburgh, PA 15235

Attorney for Debtor(s) (via ECF)  
Shawn N. Wright, Esq.  
7240 McKnight Road  
Pittsburgh, PA 15237

Trustee (via ECF)  
Ronda J. Winnecur  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: February 21, 2024

/s/ Denise Carlon

Denise Carlon Esquire  
Attorney I.D. 317226  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
215-627-1322  
dcarlon@kmllawgroup.com

post-petition payment amount			Loan#0086598208		PPFN
start	end	amount	Bk filed	9/4/2018	
10/1/2018		1194.08			
1/1/2019		1201.13	Post due	11/1/2023	
1/1/2020		1231.87	Cont due	11/1/2023	
1/1/2021		1249.59			
1/1/2022		1266.36			07/01/18
1/1/2023		1322.34			
1/1/2024		1335.44			
ACTUAL			178.20		PP PMT
post-petition accounting			post-petition accounting		
received	amount	applied	due	suspense	cont. due
12/27/2018	2092.38	2092.38	10/1/2018	0.00	
1/29/2019	857.93	857.93	11/1/2018	0.00	
2/27/2019	870.98	870.98	12/1/2018	0.00	
3/27/2019	953.21	953.21		0.00	
4/30/2019	1579.23	1579.23	1/1/2019	0.00	
			2/1/2019	0.00	
5/30/2019	1258.68	1258.68	3/1/2019	0.00	
6/28/2019	1264.21	1264.21	4/1/2019	0.00	
7/31/2019	1278.87	1278.87	5/1/2019	0.00	
9/3/2019	1281.93	1281.93	6/1/2019	0.00	
9/26/2019	642.08	642.08	7/1/2019	0.00	
10/30/2019	1268.32	1268.32	8/1/2019	0.00	
12/2/2019	1269.37	1269.37	9/1/2019	0.00	
12/31/2019	1270.15	1270.15	10/1/2019	0.00	
1/31/2020	1273.39	1273.39	11/1/2019	0.00	
2/28/2020	1910.74	1910.74	12/1/2019	0.00	
3/30/2020	637.1	637.1	1/1/2020	0.00	
4/30/2020	1886.38	1886.38	2/1/2020	0.00	
6/3/2020	1224.11	1224.11	3/1/2020	0.00	
7/7/2020	1224.22	1224.22	4/1/2020	0.00	
8/6/2020	1224.3	1224.3	5/1/2020	0.00	
8/31/2020	1224.35	1224.35	6/1/2020	0.00	

10/1/2020	612.19	612.19	7/1/2020	0.00		10/1/2020	612.19	1231.87
11/2/2020	1233.71	1233.71	8/1/2020	0.00		11/2/2020	1233.71	1231.87
12/1/2020	1864.55	1864.55	9/1/2020	0.00		12/1/2020	1864.55	1231.87
12/30/2020	621.52	621.52	10/1/2020	0.00		12/30/2020	621.52	
1/4/2021				0.00		1/4/2021		1231.87
2/11/2021	2017.59	2017.59	11/1/2020	0.00		2/11/2021	2017.59	1231.87
			12/1/2020	0.00				1231.87
3/2/2021	1182.36	1182.36		0.00		3/2/2021	1182.36	
3/29/2021	1235.11	1235.11	1/1/2021	0.00		3/29/2021	1235.11	1231.87
5/4/2021	1245.06	1245.06	2/1/2021	0.00		5/4/2021	1245.06	1231.87
6/1/2021	1251.22	1251.22	3/1/2021	0.00		6/1/2021	1251.22	1231.87
6/29/2021	1255.04	1255.04	4/1/2021	0.00		6/29/2021	1255.04	1231.87
7/28/2021	1331.36	1331.36	5/1/2021	0.00		7/28/2021	1331.36	1249.59
7/28/2021			6/1/2021	0.00		7/28/2021		1249.59
8/30/2021	1332.93	1332.93	7/1/2021	0.00		8/30/2021	1332.93	1249.59
9/27/2021	1333.91	1333.91	8/1/2021	0.00		9/27/2021	1333.91	1249.59
10/28/2021	1308.89	1308.89	9/1/2021	0.00		10/28/2021	1308.89	1249.59
11/29/2021	654.62	654.62		0.00		11/29/2021	654.62	
12/28/2021	2006.15	2006.15	10/1/2021	0.00		12/28/2021	2006.15	1249.59
			11/1/2021	0.00				1249.59
1/28/2022	1361.2	1361.2	12/1/2021	0.00		1/28/2022	1361.2	1249.59
3/2/2022	687.51	687.51		0.00		3/2/2022	687.51	
3/29/2022	2074.4	2074.4	1/1/2022	0.00		3/29/2022	2074.4	1249.59
			2/1/2022	0.00				1249.59
4/28/2022	1384.63	1384.63	3/1/2022	0.00		4/28/2022	1384.63	1249.59
6/1/2022	1390.47	1390.47	4/1/2022	0.00		6/1/2022	1390.47	1249.59
6/29/2022	1390.52	1390.52	5/1/2022	0.00		6/29/2022	1390.52	1266.36
7/28/2022	1390.52	1390.52	6/1/2022	0.00		7/28/2022	1390.52	1266.36
7/28/2022			7/1/2022	0.00		7/28/2022		1266.36
8/26/2022	1390.49	1390.49	8/1/2022	0.00		8/26/2022	1390.49	1266.36
9/29/2022	1390.43	1390.43	9/1/2022	0.00		9/29/2022	1390.43	1266.36
10/28/2022	1361.9	1361.9	10/1/2022	0.00		10/28/2022	1361.9	1266.36
11/30/2022	1361.79	1361.79	11/1/2022	0.00		11/30/2022	1361.79	1266.36
12/28/2022	685.31	685.31		0.00		12/28/2022	685.31	

